

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

ABDULHAKIM YAHYA MOHAMED (1)

a.k.a. "Abdule Hakim"

MELIK B. EBRAHIM (2)

ADIL MUNIR YUSUF (3)

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**SEALED**

No. 4:19CR271

Judge Jordan

**FIRST SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 21 U.S.C. § 846

(Conspiracy to Possess with the Intent to  
Distribute and Distribution of Cathinone  
and Cathine (KHAT))

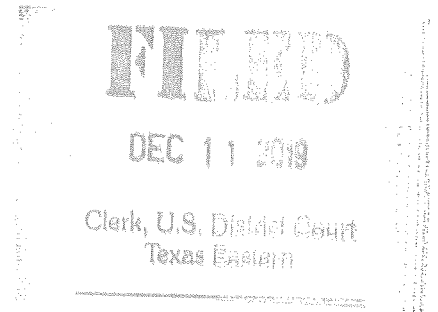
That from sometime in or about 2015, and continuously thereafter up to and  
including the date of this First Superseding Indictment, in the Eastern District of  
Texas and elsewhere,

**Abdulkhakim Yahya Mohamed, a.k.a. "Abdule Hakim"**

**Melik B. Ebrahim**

**Adil Munir Yusuf**

defendants, did knowingly and intentionally combine, conspire, and agree with each  
other and other persons known and unknown to the United States Grand Jury, to  
knowingly and intentionally possess with the intent to manufacture, distribute and



possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 21 U.S.C. § 841(a)(1)  
(Possession with the Intent to Distribute  
and Distribution of KHAT)

That from sometime in or about 2015, and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

**Abdulahkim Yahya Mohamed, a.k.a. “Abdule Hakim”  
Melik B. Ebrahim  
Adil Munir Yusuf**

defendants, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 841(a)(1).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**  
**Criminal Forfeiture Pursuant to 21 U.S.C. § 853**

As a result of committing the offenses charged in this First Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 846, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived

from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

**Substitute Assets**

Moreover, if, as a result of any act or omission of any defendants, any property subject to forfeiture:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;


The United States intends to seek forfeiture of any other property of the defendants up to the value of the forfeitable property, including but not limited to all property, both real and personal owned by the defendants. As a result of the commission of the offenses alleged in this First Superseding Indictment, any and all interest that the defendants has in any such property is vested in and forfeited to the United States.

A TRUE BILL

  
\_\_\_\_\_  
GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
HEATHER HARRIS RATTAN  
Assistant United States Attorney

  
\_\_\_\_\_  
Date

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§

MELIK B. EBRAHIM (2)

§

ADIL MUNIR YUSUF (3)

§

**NOTICE OF PENALTY**

**Count One**

Violation: 21 U.S.C. § 846

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00

**Count Two**

Violation: 21 U.S.C. § 841(a)(1)

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00